

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

G&A STRATEGIC INVESTMENTS I LLC,
et al.,

Plaintiffs,

v.

PETRÓLEOS DE VENEZUELA, S.A., *et al.*,

Defendants.

Case No. 1:23-cv-10766-JSR

GIRARD STREET INVESTMENT
HOLDINGS LLC,

Plaintiff,

v.

PETRÓLEOS DE VENEZUELA, S.A., *et al.*,

Defendants.

Case No. 1:23-cv-10772-JSR

GIRARD STREET INVESTMENT
HOLDINGS LLC,

Plaintiff,

v.

PDV HOLDING, INC.,

Defendant.

Case No. 1:24-cv-04448-JSR

**PETRÓLEOS DE VENEZUELA S.A.’S AND PDVSA PETRÓLEO, S.A.’S NOTICE OF
MOTIONS FOR SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that pursuant to Rule 56 of the Federal Rules of Civil Procedure, Defendants Petróleos de Venezuela, S.A. (“PDVSA”) and PDVSA Petróleo, S.A. (“PDVSA Petróleo”) (collectively, “Defendants”) intend to move this court for an order granting summary

judgment against Plaintiffs for all or portions of the relief sought in the Amended Complaint in *G&A Strategic Investments I LLC et al. v. Petróleos de Venezuela, S.A. et al.*, No. 1:23-cv-10766-JSR, and in the Consolidated Amended Complaint in *Girard Street Investment Holdings LLC v. Petróleos de Venezuela, S.A. et al.*, No. 1:23-cv-10772- JSR and *Girard Street Investments Holdings LLC v. PDV Holding, Inc.*, No. 1:24-cv-4448-JSR. In accordance with the schedule approved by the Court on February 27, 2025, Defendants’ moving papers are due on March 19, 2025, Plaintiffs’ answering papers are due on April 2, 2025, Defendants’ reply papers are due on April 9, 2025, and oral argument is set for April 23, 2025 at 2:00 p.m. ET at 500 Pearl Street, New York, New York.

[Signature block on the following page.]

Dated: March 3, 2025

Respectfully submitted,

VINSON & ELKINS LLP

By: /s/ Camilo Cardozo

Camilo Cardozo

Dora Georgescu

1114 Avenue of the Americas

32nd Floor

New York, NY 10036

Telephone: 212.237.0051

Facsimile: 212.237.0100

ccardozo@velaw.com

dgeorgescu@velaw.com

Matthew Hoffman

Aamir Siddik

Briana Falcon

Andreina Escobar

845 Texas Avenue, Suite 4700

Houston, Texas 77002

Telephone: 713.758.2838

Facsimile: 713.615.5942

mhoffman@velaw.com

asiddik@velaw.com

bfalcon@velaw.com

aescobar@velaw.com

**ATTORNEYS FOR DEFENDANTS,
PETRÓLEOS DE VENEZUELA, S.A. AND
PDVSA PETRÓLEO, S.A.**

CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of March, 2025, a true and correct copy of the foregoing PETRÓLEOS DE VENEZUELA S.A.'S AND PDVSA PETRÓLEO, S.A.'S NOTICE OF MOTIONS FOR SUMMARY JUDGMENT was served by via ECF on all counsel of record.

/s/ Camilo Cardozo
Camilo Cardozo